

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RAAMI MAAT,)	
)	
Plaintiff,)	No: FILED: APRIL 3, 2008
)	08CV1928 AEE
v.)	Judge JUDGE MANNING
)	MAGISTRATE JUDGE VALDEZ
)	Magistrate
OFFICER JOHN DOE, JOHN ROE AND)	
THE CITY OF CHICAGO,)	
A MUNICIPAL CORPORATION,)	Jury Demand
Defendants.)	

COMPLAINT

1. The jurisdiction of this Court is invoked pursuant to the Civil Rights Act, 42 U.S.C. Sections 1983 and 1988; 28 U.S.C. Sections 1331 and 1323 (3); and the Constitution of the United States, and supplemental jurisdiction under 28 U.S.C. Section 1367.

2. Plaintiff Raami Maat is an African-American male, a citizen of the United States, and a resident of Cook County.

3. Defendant OFFICERS JOHN DOE AND JOHN ROE, whose names are not currently known, are police officers employed by the City of Chicago, and were at all times relevant to the facts alleged in this complaint, acting within the scope of their employment and under color of law. Defendant Officers John Doe and John Roe are being sued individually.

4. The City of Chicago is a municipal corporation within the State of Illinois, and was all times material to this Complaint, the employer of defendant police

officers John Doe and John Roe.

FACTS

5. On October 21, 2006, at approximately 11:00 p.m., Plaintiff Raami Maat was riding in his car on Lauler Ave. in the city of Chicago when his car was pulled over by two white officers in a marked squad car.

6. The officers ordered Maat out of the car at gun point. Maat was then beaten by one of the officers as one of the other officer watched.

7. A defendant officer planted a gun in the vehicle in which Maat was riding and Maat was subsequently arrested for unlawful use of a weapon by a felon. Both officers knew the charges to be false.

8. Maat was taken to the Cook County jail that evening where he remained until he was found not guilty on April 4, 2007.

COUNT I

(42 U.S.C. Section 1983-Excessive Force Claim)

(1-8). Plaintiff Raami Maat alleges and realleges paragraphs 1 through 8 as fully set forth above.

9. As a result of the unreasonable and unjustifiable attack on Raami Maat, Maat suffered both physical and emotional injuries.

10. This unreasonable and unjustifiable beating of the Plaintiff Raami Maat by Defendant Officers John Doe while defendant John Roe watched was a direct and proximate cause of his pain, suffering and mental anguish. The acts by the above individual Defendants violated the Plaintiff's Fourth Amendment

right to be free from unreasonable seizures, in addition to a violation of 42 U.S.C. 1983.

WHEREFORE, Plaintiff Raami Maat demands \$50,000 in compensatory damages against Defendant Officers John Doe and John Roe, and because the Defendants acted maliciously, willfully and/or wantonly, Plaintiff demands \$25,000 in punitive damages from each individual defendant, plus cost, attorney's fees, and such other additional relief as this Court deems equitable and just.

COUNT II

(42 U.S.C. Section 1983-False Arrest)

(1-8). Plaintiff Raami Maat alleges and realleges paragraphs 1 through 8 as fully set forth herein.

9. The above acts of the Defendant Officers John Doe and John Roe were willfully and wantonly done without probable cause and was a direct and proximate cause of Mr. Maat's pain, suffering and mental anguish, and therefore violated the Plaintiff's Forth Amendment right to be free from unreasonable arrest, search and seizure.

WHEREFORE, Plaintiff Raami Maat seeks \$50,000 in actual or compensatory damages against Defendant Officers John Doe and John Roe individually and because they acted maliciously, willfully and/or wantonly, Plaintiff demands \$25,000 in punitive damages against Defendant Officers John Doe and John Roe individually.

COUNT III

(42 U.S.C. Section 1983-Conspiracy)

(1-8). Plaintiff Raami Maat alleges and realleges paragraphs 1 through 8 as fully set forth herein.

9. Officers John Doe and John Roe reached an understanding, engaged in a sequence of events or course of conduct, and otherwise agreed and conspired together to violate the constitutional rights of the Plaintiff.

10. Each defendant did reach this understanding and agreement, and did engage in this course of conduct with the mutual purpose, objective, and knowledge that it would deprive the Plaintiff of his rights, privileges and immunities as guaranteed by the Constitution and laws of the United States.

11. Additionally, said conspiracy/joint action violated Plaintiff's Fourth Amendment rights under the color of law in violation of 42 U.S.C. Section 1983, and was a direct and proximate cause of his pain, suffering and mental anguish.

12. Acting in furtherance of this plan and conspiracy, each of the Defendants committed overt acts, including, but not limited to, an unjustifiable beating and false arrest as fully alleged in paragraphs 1-8. This course of conduct by the Defendants was done willfully, maliciously, intentionally or with reckless disregard and directly and proximately caused serious injury to the Plaintiff.

WHEREFORE Plaintiff demands \$50,000 in compensatory damages against each Defendant, and because the Defendants acted maliciously, willfully and /or wantonly, Plaintiff demands \$25,000 in punitive damages against

Defendant Officers John Doe and John Roe individually.

COUNT IV

(Assault and Battery Under Illinois Law)

(1-8). Plaintiff Raami Maat alleges and realleges paragraphs 1 through 8 as though fully set forth herein.

9. The acts of the Defendant Officers John Doe and John Roe described above, were done maliciously, willfully and wantonly and with such reckless disregard for their natural consequences as to constitute assault and battery under the laws and Constitution of the State of Illinois, and did directly and proximately cause the injuries, pain and suffering of the Plaintiff as alleged above.

WHEREFORE, Plaintiff Raami Maat demands judgment against Defendant Officers John Doe and John Roe individually, in an amount in excess of \$30,000 in compensatory damages; and because the Defendants acted maliciously, willfully and/or wantonly, \$15,000 in punitive or exemplary damages, plus costs for the battery against him.

COUNT V

(Malicious Prosecution Under Illinois Law)

(1-8). Plaintiff Raami Maat alleges and realleges paragraphs 1 through 8 as though fully set forth herein.

9. The above prosecution was initiated by the defendants to cover up the unjustifiable beating of the Plaintiff.

10. The defendants signed complaints against Plaintiff which began the prosecution of him. Defendants further gave false statements against Plaintiff to the prosecution.

11. The unjustifiable prosecution was resolved in the Plaintiff's behalf and, therefore, said prosecution was in violation of the Illinois law.

12. The unjustifiable prosecution of the Plaintiff Raami Maat was done willfully and wantonly and was the direct and proximate cause of the physical and mental injuries suffered by the Plaintiff.

WHEREFORE, Plaintiff Raami Maat seeks \$50,000 in actual or compensatory damages against Defendant Officers John Doe and John Roe individually, and because the above defendants acted maliciously, willfully and/or wantonly, Plaintiff demands \$20,000 in punitive damages against each defendant officer.

COUNT VI

(Respondent Superior Under Illinois Law Against the City of Chicago)

(1-8). Plaintiff Raami Maat alleges and realleges paragraphs 1 through 8 as though fully set forth herein.

9. The aforesaid acts of Defendant Officers John Doe and John Roe in beating and maliciously prosecuting Raami Maat was done within the scope of their employment as Chicago police officers, was willful and wanton, and therefore the defendant City of Chicago, as principal, is liable for the actions of its agents under the doctrine of respondent superior.

WHEREFORE, Plaintiff Raami Maat demands judgment against defendant City of Chicago, plus costs, and such other additional relief as this Court deems equitable and just.

PLAINTIFF DEMANDS TRIAL BY JURY ON ALL COUNTS.

Respectfully Submitted,

The Law Office of Standish E. Willis

By: _____
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